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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

May 10, 1993

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FCC MAIL BRANCH

Ms. Donna R. Searcy
Office of the Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Re: In the Matter of Amendment of Section 25.131,
CC Docket 93-23, RM-7931

Dear Secretary Searcy,

Enclosed herewith is one (1) original, and five (5) copies of our
comments in above referenced proceeding.

Sincerely,

COMSEARCH

Douglass R. Hall
Vice President
Transmission Planning Services

Enclosures

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MAY 12 1993

Before the
Federal Communications Commission
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of Section 25.131
of the Commission's Rules and
Regulations to Eliminate the
Licensing Requirement for Certain
International Receive-Only
Earth Stations

CC Docket No 93-23
RM-7931

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COMMENTS OF COMSEARCH
ON THE
NOTICE OF PROPOSED RULE MAKING

Comsearch respectfully submits its comments in response to the Commission's Notice of Proposed Rule Making (NPRM) in CC Docket 93-23. In this NPRM the Commission proposes to revise Part 25 of its Rules to eliminate the licensing requirement for most international receive-only earth stations in the fixed satellite service.

Comsearch is an independent firm specializing in spectrum management and frequency coordination of terrestrial microwave, satellite, and mobile telecommunications systems.

Registration

The NPRM proposes "to establish a streamlined registration program, similar to that used for domestic receive-only earth stations."¹ Under this plan, applicants desiring registration would first complete frequency coordination, then submit the completed

¹ NPRM, CC Docket 93-23, paragraph 15.

application to the Commission. The Commission would assign the application a file number, place it on public notice as accepted for filing, and the station would be automatically authorized 30

1. **Change of Antenna Type**

A larger antenna does not always have better sidelobe performance than a smaller antenna and could actually increase the interference contribution to the environment

5. Assignments and Transfers

Without notification of assignment or transfer of stations there would be no way for the industry to update contacts for the station. The user may not be notified of new system coordinations in the area, thereby causing potential interference conflicts or additional delays in the coordination process.

Comsearch proposes that these modifications be reported through the